

December 15, 2021, to allow them to conserve resources and continue to focus on furthering a potential resolution of this action.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiffs and SME, as follows:

1. The litigation, including any court deadlines set by this Court or the Federal Rules of Civil Procedure, all discovery, and deadlines regarding the third-party defendants, shall remain stayed until December 15, 2021, at which point, if the Parties have not reached a class-wide settlement in principle, the Parties will work together to submit a stipulated case schedule for the Court's consideration.

2. This Stipulation is without prejudice to the Parties hereto agreeing, subject to Court approval, to a further extension of the stay if circumstances warrant.

3. The Parties shall report to the Court on or before the expiration of the stay regarding their progress toward resolution.

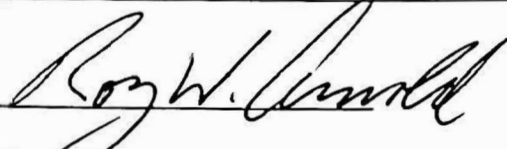

4. In the event that the Parties reach an impasse or their settlement discussions irretrievably break down, the Parties shall meet and confer in good faith as to whether ongoing discussions are expected to be fruitful and if any Party (Plaintiffs or SME) determines that such discussions are likely to be no longer productive then the Party may notify the Court after five business days of the Parties' meet and confer to request that the Court terminate the stay for good cause.

5. As noted above, the Parties made three previous requests for a stay of litigation, which this Court granted. Dkts. 141, 148, 152.

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AGREED:

 Ryan P. Cronin Roy W. Arnold (<i>Pro Hac Vice</i>) Gregory M. Bordo (<i>Pro Hac Vice</i>) David M. Perry (<i>Pro Hac Vice</i>) Julianna Simon (<i>Pro Hac Vice</i>) BLANK ROME LLP 1271 Avenue of the Americas New York, NY 10020 Evan S. Cohen (<i>Pro Hac Vice</i>) Maryann R. Marzano (<i>Pro Hac Vice</i>) COHEN MUSIC LAW 1180 South Beverly Drive, Suite 510 Los Angeles, CA 90035-1157 <i>Attorneys for Plaintiffs</i> Dated: October 14, 2021	 Scott A. Edelman (<i>Pro Hac Vice</i>) Gabrielle Levin Nathaniel L. Bach (<i>Pro Hac Vice</i>) GIBSON, DUNN & CRUTCHER LLP 200 Park Avenue New York, New York 10166 Steven Englund (<i>Pro Hac Vice</i>) JENNER & BLOCK LLP 1099 New York Avenue, NW, Suite 900 Washington, DC 20001 <i>Attorneys for Defendant Sony Music Entertainment</i> Dated: October 14, 2021
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IT IS SO ORDERED.

Dated: October 15, 2021

By: 
Hon. Edgardo Ramos
United States District Judge